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*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

J. DOE 1 et al.,
Individual and Representative Plaintiffs,
v.
GITHUB, INC., et al.,
Defendants.

Case Nos. 4:22-cv-06823-JST
4:22-cv-07074-JST

**DECLARATION OF TRAVIS
MANFREDI IN SUPPORT OF
PLAINTIFFS' MOTION TO MAINTAIN
CONFIDENTIALITY DESIGNATIONS
FOR PLAINTIFFS' TRUE NAMES
PURSUANT TO SECTION 6.3 OF THE
STIPULATED PROTECTIVE ORDER
(ECF NO. 63)**

Date: May 4, 2023
Time: 2:00 p.m.
Courtroom: 6, 2nd Floor
Judge: Hon. Jon Tigar

4:22-cv-06823-JST

DECLARATION OF TRAVIS MANFREDI IN SUPPORT OF PLAINTIFFS' MOTION TO MAINTAIN
CONFIDENTIALITY DESIGNATIONS FOR PLAINTIFFS' TRUE NAMES PURSUANT TO SECTION 6.3
OF THE STIPULATED PROTECTIVE ORDER (ECF NO. 63)

1 I, Travis Manfredi, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am an
 3 associate at the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Does 1–4
 4 in this action. I have personal knowledge of the matters stated herein and, if called upon, I could
 5 competently testify thereto. I make this declaration pursuant to 28 U.S.C. Section 1746 in
 6 support of Plaintiffs’ Motion to Maintain Confidentiality Designations for Plaintiffs’ True
 7 Names Pursuant to Section 6.3 of the Stipulated Protective Order (ECF No. 63).

8 2. Defendants Microsoft Corp. and GitHub, Inc. (collectively “Defendants”)
 9 notified Plaintiffs by letter of their challenge of Plaintiffs’ designation of their true names as
 10 “HIGHLY CONFIDENTIAL” pursuant to Section 6.2 of the Stipulated Protective Order.
 11 Defendants’ letter does not include the additional “–ATTORNEYS’ EYES ONLY” portion of
 12 the designation. The Stipulated Protective Order does not contain a designation of “HIGHLY
 13 CONFIDENTIAL” alone.

14 3. In their letter, Defendants stated the basis for their challenge is “that Rule 10(a)
 15 and the Advanced Textile case require extraordinary circumstances for keeping such information
 16 a secret, and that no such circumstances are present here.”

17 4. Counsel for the parties met and conferred in voice-to-voice dialogue prior to the
 18 filing of this motion regarding the subject of this motion.

19 I declare under penalty of perjury that the foregoing is true and correct. Executed this
 20 30th day of March, 2023 at San Francisco, California.

21
 22 /s/ Travis Manfredi
 23 Travis Manfredi
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